

EXHIBIT 6



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Transcript of Todd A. Webb

Date: March 21, 2024

Case: Karnas, et al. -v- Cuban, et al.

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IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

-----x
DOMINIK KARNAS, et al., :
Plaintiffs, : Case No.
v. : 1:22-cv-22538-ALTMAN/REID
MARK CUBAN, et al., :
Defendants. :
-----x

Videotaped Deposition of
TODD A. WEBB
Conducted Virtually
Thursday, March 21, 2024
2:31 p.m. EST

Job No.: 530569

Pages: 1 - 127

Reported by: Nancy C. Bendish, CCR, RMR, CRR

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| | | |
|----|---|----------|
| 1 | kind, plus the interest that we were promised. | 14:55:23 |
| 2 | Q. And you've received some monies | 14:55:30 |
| 3 | back, correct? | 14:55:36 |
| 4 | A. Correct. | 14:55:37 |
| 5 | Q. And how much have you received | 14:55:38 |
| 6 | back from the estate? | 14:55:39 |
| 7 | A. Somewhere in the order of 30 | 14:55:43 |
| 8 | percent of what the value of the holdings were | 14:55:45 |
| 9 | at that time. | 14:55:50 |
| 10 | Q. I saw something like \$6,700 or | 14:55:52 |
| 11 | around that? Do you know exactly how much you | 14:55:55 |
| 12 | received back? | 14:56:00 |
| 13 | A. That sounds about right. It's | 14:56:01 |
| 14 | hard for me to pin down exactly like a value, | 14:56:08 |
| 15 | because some of the money I put directly in as | 14:56:11 |
| 16 | US dollars and bought on the Voyager platform, | 14:56:14 |
| 17 | and some was crypto that I transferred over, | 14:56:18 |
| 18 | which each had its own cost basis. | 14:56:20 |
| 19 | Q. Right. However, whatever buttons | 14:56:24 |
| 20 | they pushed in the bankruptcy to get you a | 14:56:30 |
| 21 | number back, I believe I saw it was around | 14:56:33 |
| 22 | \$6700, but we can dig into that in a little bit. | 14:56:39 |
| 23 | But is that about the right number that you | 14:56:43 |
| 24 | recall? | 14:56:46 |
| 25 | A. It's around the right number, | 14:56:48 |

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| | | |
|----|--|----------|
| 1 | yeah. | 14:56:50 |
| 2 | Q. Okay. So, I'd like to spend a bit | 14:56:51 |
| 3 | of time unpacking some of your statements. | 14:57:09 |
| 4 | So, let's take the statements that | 14:57:12 |
| 5 | you made and just kind of focus on those first. | 14:57:18 |
| 6 | One of the statements that you | 14:57:23 |
| 7 | made were that all the accounts were earn | 14:57:25 |
| 8 | accounts. Is one of the claims as against Mark | 14:57:31 |
| 9 | if people signed up, all the accounts were earn | 14:57:38 |
| 10 | accounts; does that mean that the members of the | 14:57:43 |
| 11 | class are members that had Earn Program | 14:57:46 |
| 12 | accounts? | 14:57:51 |
| 13 | MR. BUSHMAN: Object to form. | 14:57:52 |
| 14 | Q. What do you mean by the statement, | 14:57:53 |
| 15 | all accounts were earn accounts? | 14:57:55 |
| 16 | A. Well, I believe that all of the | 14:58:00 |
| 17 | accounts at Voyager were eligible for earn. So, | 14:58:01 |
| 18 | if you had an account at Voyager, then you could | 14:58:07 |
| 19 | participate in earning interest or in kind, on | 14:58:11 |
| 20 | any of the cryptos that were supported there. | 14:58:19 |
| 21 | Q. And indeed, indeed that is, I | 14:58:24 |
| 22 | believe, accurate. However, you must agree that | 14:58:31 |
| 23 | the account was self-directed, correct? You | 14:58:36 |
| 24 | made your own investment decisions? | 14:58:42 |
| 25 | A. Yes. | 14:58:45 |

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| | | | |
|----|----|--|----------|
| 1 | Q. | And that applies to anybody who | 14:58:46 |
| 2 | | had an account at Voyager, correct? | 14:58:48 |
| 3 | A. | I can't speak to that for other | 14:58:51 |
| 4 | | class members. | 14:58:55 |
| 5 | Q. | Well, it's in the documents, it's | 14:58:56 |
| 6 | | in the agreement that you signed when you signed | 14:58:59 |
| 7 | | up for Voyager, and you acknowledged that the | 14:59:01 |
| 8 | | account was self-directed. So everybody signed | 14:59:06 |
| 9 | | the same documents, right? The process of | 14:59:08 |
| 10 | | applying for an account is uniform for everyone, | 14:59:11 |
| 11 | | right? | 14:59:16 |
| 12 | A. | I suppose, if I understand the | 14:59:18 |
| 13 | | question correctly. If you're asking whether | 14:59:22 |
| 14 | | every single person that had an account did it | 14:59:24 |
| 15 | | on their own and didn't have an investment | 14:59:27 |
| 16 | | manager, I don't know that. | 14:59:29 |
| 17 | Q. | It's an application, correct? | 14:59:36 |
| 18 | | It's an app on your phone, right? | 14:59:41 |
| 19 | A. | That's how I interfaced with | 14:59:44 |
| 20 | | Voyager, yes. | 14:59:46 |
| 21 | Q. | Is there any other way to | 14:59:46 |
| 22 | | interface with Voyager than on a phone? | 14:59:48 |
| 23 | A. | There's a company there and they | 14:59:54 |
| 24 | | have a website. You can contact them directly | 14:59:55 |
| 25 | | if you like. | 14:59:58 |

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|----|----|--|----------|
| 1 | Q. | Yeah, but the account and the use | 14:59:59 |
| 2 | | of the account is through an application, not | 15:00:05 |
| 3 | | through a website; right? | 15:00:08 |
| 4 | A. | I believe so. I don't know if you | 15:00:13 |
| 5 | | could buy and sell anything by contacting them | 15:00:15 |
| 6 | | directly. | 15:00:19 |
| 7 | Q. | Okay. | 15:00:22 |
| 8 | A. | I assume most everything was | 15:00:23 |
| 9 | | through the application. | 15:00:24 |
| 10 | Q. | Give me one second because I | 15:00:37 |
| 11 | | didn't think we would have an issue about this. | 15:00:41 |
| 12 | | Let me find it. | 15:00:43 |
| 13 | | MR. BEST: Can we pull up Exhibit | 15:00:55 |
| 14 | | 8, please. Mark that Defendant's 1. And then | 15:01:00 |
| 15 | | if you can make it just a little bigger, please. | 15:01:32 |
| 16 | | (Exhibit Webb 1 was marked and | 15:01:37 |
| 17 | | introduced at this time.) | 15:01:39 |
| 18 | Q. | I represent to you this is | 15:01:39 |
| 19 | | Voyager's customer agreement as updated on | 15:01:41 |
| 20 | | August 20th, 2021; that in the process of | 15:01:43 |
| 21 | | signing on for an account you had to check -- | 15:01:50 |
| 22 | | well, let me just end it, what I represent this | 15:01:55 |
| 23 | | to be. | 15:01:59 |
| 24 | | Do you remember signing up for | 15:02:00 |
| 25 | | your account? | 15:02:02 |

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|----|----|--|----------|
| 1 | A. | Yes. | 15:02:02 |
| 2 | Q. | And in the process of signing up | 15:02:03 |
| 3 | | for your account, you had to check a box that | 15:02:04 |
| 4 | | you read and agreed to the customer agreement | 15:02:06 |
| 5 | | before they let you open an account, correct? | 15:02:11 |
| 6 | A. | Correct. | 15:02:14 |
| 7 | Q. | If I can turn your attention to | 15:02:15 |
| 8 | | the fifth page of this document, which is | 15:02:24 |
| 9 | | paragraph 6, Voyager Services. | 15:02:28 |
| 10 | A. | Okay. | 15:02:32 |
| 11 | Q. | Do you see the first sentence in | 15:02:32 |
| 12 | | paragraph number 6, Voyager Services? | 15:02:38 |
| 13 | A. | I do. | 15:02:41 |
| 14 | Q. | And what does it say? | 15:02:42 |
| 15 | A. | It says: "The account is | 15:02:44 |
| 16 | | self-directed." | 15:02:47 |
| 17 | Q. | And what do you understand that to | 15:02:49 |
| 18 | | mean? | 15:02:50 |
| 19 | A. | That means that you choose what | 15:02:51 |
| 20 | | you're going to be investing in within that | 15:02:54 |
| 21 | | account. | 15:02:57 |
| 22 | Q. | And again, do you have any reason | 15:03:00 |
| 23 | | to believe that this isn't uniform for everybody | 15:03:02 |
| 24 | | who signs up on a Voyager platform to start an | 15:03:07 |
| 25 | | account? | 15:03:13 |

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|----|----|---|----------|
| 1 | A. | They may have changed their terms | 15:03:14 |
| 2 | | at some point, but otherwise I would think that | 15:03:16 |
| 3 | | this is uniform, yes. | 15:03:20 |
| 4 | Q. | And if I can turn to section E, | 15:03:25 |
| 5 | | which is about the ninth page of this document. | 15:03:29 |
| 6 | | It's after number 10. Okay. If we can go to | 15:03:51 |
| 7 | | section E, please. | 15:04:03 |
| 8 | | And do you see section E? | 15:04:07 |
| 9 | A. | I do. | 15:04:09 |
| 10 | Q. | Do you see it's in bold as opposed | 15:04:09 |
| 11 | | to the rest of the typeface, which was not in | 15:04:12 |
| 12 | | bold? | 15:04:15 |
| 13 | A. | Okay. | 15:04:16 |
| 14 | | MR. BEST: Can you scroll up, | 15:04:19 |
| 15 | | please, so that Mr. Webb can see. | 15:04:20 |
| 16 | Q. | Do you see how section D is not in | 15:04:24 |
| 17 | | bold, for the most part? | 15:04:27 |
| 18 | A. | Yes. | 15:04:29 |
| 19 | Q. | Can you read to me, please, the | 15:04:31 |
| 20 | | title of section E. | 15:04:35 |
| 21 | A. | "Rewards Program Risks." | 15:04:36 |
| 22 | Q. | Okay. And what's the first risk | 15:04:40 |
| 23 | | that's identified; can you read that into the | 15:04:42 |
| 24 | | record? | 15:04:45 |
| 25 | A. | Sure. "By virtue of entering into | 15:04:46 |

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| | | |
|----|--|----------|
| 1 | a commercial arrangement such as this customer | 15:04:49 |
| 2 | agreement, customer is exposed to potential | 15:04:51 |
| 3 | Voyager credit risk. By participating in the | 15:04:54 |
| 4 | Rewards Program customer's cryptocurrency may be | 15:04:57 |
| 5 | at increased risk of loss." | 15:05:01 |
| 6 | Q. And when you signed up for the | 15:05:05 |
| 7 | account you agreed, you acknowledged and | 15:05:07 |
| 8 | understood this risk and accepted it? | 15:05:10 |
| 9 | A. I wouldn't agree that I fully | 15:05:15 |
| 10 | understood the risks that Voyager had, in | 15:05:18 |
| 11 | hindsight, but yes, I understood that there was | 15:05:24 |
| 12 | risk. | 15:05:28 |
| 13 | Q. Some of the risks in hindsight, | 15:05:28 |
| 14 | for instance the three (indiscernible) actually | 15:05:33 |
| 15 | hadn't happened at the time you invested, | 15:05:36 |
| 16 | though, correct? | 15:05:38 |
| 17 | A. I don't know that. | 15:05:41 |
| 18 | Q. Let's look at paragraph 2, "Loans | 15:05:46 |
| 19 | may not be secured." Can you read number 2 into | 15:05:49 |
| 20 | the record, please. | 15:05:51 |
| 21 | A. Sure. "Loans may not be secured. | 15:05:52 |
| 22 | Cryptocurrency subject to a loan will not be | 15:05:55 |
| 23 | held by Voyager or the custodians. Customer | 15:05:58 |
| 24 | understands and acknowledges that Voyager is not | 15:06:01 |
| 25 | responsible for any cryptocurrency that Voyager | 15:06:04 |

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|----|---|----------|
| 1 | BY MR. BEST: | 15:38:02 |
| 2 | Q. I want to keep focusing on what | 15:38:03 |
| 3 | your view of the class you represent is, | 15:38:07 |
| 4 | Mr. Webb. | 15:38:10 |
| 5 | In continuing to explore the | 15:38:14 |
| 6 | definition of the class, does the class of | 15:38:16 |
| 7 | investors -- and when I use the term | 15:38:23 |
| 8 | "investors," it's those people who opened | 15:38:27 |
| 9 | accounts at Voyager -- does the class have to | 15:38:29 |
| 10 | have any touchpoints to Mark Cuban and the Mavs | 15:38:34 |
| 11 | like you do, with the Mavs code? | 15:38:38 |
| 12 | MR. BUSHMAN: Object to the form. | 15:38:41 |
| 13 | A. I think that is kind of central. | 15:38:50 |
| 14 | Q. And your touchpoint -- without | 15:39:06 |
| 15 | talking to you, one could identify your | 15:39:06 |
| 16 | touchpoint to the Mavs and Mark Cuban as using | 15:39:10 |
| 17 | the MAVS100 code in signing up for a crypto | 15:39:15 |
| 18 | account and using that code; is that a fair | 15:39:22 |
| 19 | statement? | 15:39:26 |
| 20 | A. What exactly do you mean by a | 15:39:27 |
| 21 | touchpoint? | 15:39:29 |
| 22 | Q. If somebody wanted to -- that | 15:39:30 |
| 23 | doesn't interview you -- wanted to see that you | 15:39:33 |
| 24 | may have been exposed to the Mavericks | 15:39:36 |
| 25 | promotional and sponsorship agreement, and | 15:39:46 |

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|----|--|----------|
| 1 | relied in some way, shape or form on Mark Cuban | 15:39:55 |
| 2 | to open their Voyager account without talking to | 15:40:00 |
| 3 | that person, one way to do it would be to look | 15:40:05 |
| 4 | to see if you used the Mav's promotional code, | 15:40:08 |
| 5 | correct? | 15:40:18 |
| 6 | A. Yes. Although I think it might | 15:40:19 |
| 7 | include people outside that because that | 15:40:20 |
| 8 | promotional code I think was only good for three | 15:40:22 |
| 9 | days. So there may be people that were also | 15:40:25 |
| 10 | influenced but weren't able to join in that | 15:40:30 |
| 11 | three-day period. | 15:40:33 |
| 12 | Q. And I want to talk about those, in | 15:40:34 |
| 13 | a bit. | 15:40:36 |
| 14 | How do you identify those people | 15:40:39 |
| 15 | in the class from just simply looking at the | 15:40:41 |
| 16 | documents? | 15:40:45 |
| 17 | MR. BUSHMAN: Object to the form. | 15:40:46 |
| 18 | Q. Without talking to them, how do | 15:40:49 |
| 19 | you identify those people who may have been | 15:40:50 |
| 20 | influenced by Mark Cuban and the Mavs, but | 15:40:59 |
| 21 | didn't sign up for the promotional code? | 15:41:03 |
| 22 | MR. BUSHMAN: Object to the form. | 15:41:05 |
| 23 | A. That's a good question. If you're | 15:41:10 |
| 24 | looking for how do you prove that, I mean, these | 15:41:12 |
| 25 | are people that say that that's why they joined | 15:41:18 |

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| 1 | then. | 15:41:23 |
| 2 | Q. But I'd have to interview each one | 15:41:24 |
| 3 | of them, correct? | 15:41:26 |
| 4 | MR. BUSHMAN: Object to the form. | 15:41:27 |
| 5 | A. If they didn't use the MAVS100 | 15:41:32 |
| 6 | code? | 15:41:35 |
| 7 | Q. Correct. | 15:41:36 |
| 8 | A. I suppose. | 15:41:37 |
| 9 | Q. Okay. Let me kind of walk through | 15:41:38 |
| 10 | as I see three groupings of people that had | 15:41:46 |
| 11 | Voyager accounts, okay? And just bear with me | 15:41:51 |
| 12 | for 15 seconds, 20 seconds. It's always more. | 15:41:55 |
| 13 | The first group are those Voyager | 15:42:00 |
| 14 | acountholders who signed up for a Voyager | 15:42:05 |
| 15 | account before Mark Cuban and the Dallas | 15:42:12 |
| 16 | Mavericks announced their sponsorship agreement, | 15:42:19 |
| 17 | October 27th, 2021, okay? | 15:42:22 |
| 18 | A. Okay. | 15:42:26 |
| 19 | MR. BUSHMAN: I object to the form | 15:42:26 |
| 20 | of that question. Go ahead. | 15:42:27 |
| 21 | Q. Do you acknowledge that there are | 15:42:32 |
| 22 | a group of people that opened their account | 15:42:33 |
| 23 | before, and traded and invested, before October | 15:42:38 |
| 24 | 27th, 2021? | 15:42:45 |
| 25 | A. I assume so. I don't know that. | 15:42:48 |

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| | | | |
|----|----|--|----------|
| 1 | Q. | Well, you know that Voyager was an | 15:42:52 |
| 2 | | active crypto account wallet and had an exchange | 15:42:55 |
| 3 | | before you actually opened your account on | 15:43:03 |
| 4 | | October 29th, right? | 15:43:06 |
| 5 | A. | I would assume so. | 15:43:08 |
| 6 | Q. | And do you represent a class of | 15:43:12 |
| 7 | | people that opened their accounts before October | 15:43:16 |
| 8 | | 27th, 2021 and traded before the Mavs' | 15:43:22 |
| 9 | | sponsorship announcement? | 15:43:28 |
| 10 | | MR. BUSHMAN: Object to form. | 15:43:30 |
| 11 | A. | I would say possibly. Sorry. | 15:43:32 |
| 12 | | I'd say possibly, if they stayed | 15:43:34 |
| 13 | | at Voyager because of -- if they thought the | 15:43:37 |
| 14 | | platform was more legitimate because it was | 15:43:41 |
| 15 | | backed by the Mavs and Mark Cuban, then I don't | 15:43:44 |
| 16 | | know that it should be limited to just people | 15:43:48 |
| 17 | | that used the MAV100 code, but anybody that was | 15:43:50 |
| 18 | | still there, with their full face in Voyager | 15:43:55 |
| 19 | | when it collapsed. | 15:43:57 |
| 20 | Q. | And we talked about this just a | 15:44:02 |
| 21 | | few minutes ago, which was there's no readily | 15:44:05 |
| 22 | | identifiable way to determine whether or not | 15:44:11 |
| 23 | | those people stayed because of Mark Cuban | 15:44:16 |
| 24 | | without interviewing or talking to them | 15:44:22 |
| 25 | | individually, correct? | 15:44:26 |

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| | | |
|----|--|----------|
| 1 | MR. BUSHMAN: Object to the form. | 15:44:27 |
| 2 | Q. How would you determine that they | 15:44:30 |
| 3 | stayed in the platform or effected any trades | 15:44:33 |
| 4 | because of Mark Cuban from simply looking at | 15:44:41 |
| 5 | their trading history? | 15:44:47 |
| 6 | MR. BUSHMAN: Object to the form. | 15:44:48 |
| 7 | A. I don't know. | 15:44:50 |
| 8 | Q. How would you -- if I asked you to | 15:44:55 |
| 9 | figure out a way that -- whether or not these | 15:44:58 |
| 10 | people were influenced by Mark Cuban, what would | 15:45:04 |
| 11 | you think that your options are? | 15:45:07 |
| 12 | MR. BUSHMAN: Object to the form. | 15:45:09 |
| 13 | A. Ask them. | 15:45:14 |
| 14 | Q. Individually. | 15:45:15 |
| 15 | MR. BUSHMAN: Object to the form. | 15:45:16 |
| 16 | Q. Correct? | 15:45:18 |
| 17 | A. I don't know about individually. | 15:45:21 |
| 18 | You could easily -- we live in an age of | 15:45:23 |
| 19 | technology. We have -- Voyager has their | 15:45:25 |
| 20 | database. You just send a message to all of | 15:45:30 |
| 21 | them. | 15:45:33 |
| 22 | Q. But you're sending it to each of | 15:45:33 |
| 23 | them individually, is the point? | 15:45:36 |
| 24 | A. Yes. | 15:45:39 |
| 25 | Q. And then there's a group of | 15:45:44 |

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| | | |
|----|--|----------|
| 1 | investors that signed up on or after October | 15:45:46 |
| 2 | 27th, 2021 that used the Mav's promotional code, | 15:45:50 |
| 3 | just like you, right? | 15:45:59 |
| 4 | A. Okay. | 15:46:01 |
| 5 | Q. Well, would you agree that you're | 15:46:03 |
| 6 | not the only one who used the MAVS100 code? | 15:46:05 |
| 7 | A. I'm pretty sure there's a lot of | 15:46:11 |
| 8 | people that used that code. | 15:46:13 |
| 9 | Q. And those investors are in a like | 15:46:19 |
| 10 | situation to you from the standpoint that they | 15:46:22 |
| 11 | opened their account on or after October 27th | 15:46:27 |
| 12 | and used the MAVS100 code to open their account, | 15:46:32 |
| 13 | correct? | 15:46:36 |
| 14 | A. Okay. | 15:46:38 |
| 15 | Q. Okay. And you represent that | 15:46:40 |
| 16 | class of people, correct? | 15:46:43 |
| 17 | A. Yes. | 15:46:45 |
| 18 | Q. Now, let's talk about the third | 15:46:48 |
| 19 | category, which is investors that opened their | 15:46:51 |
| 20 | account after October 27th, but didn't use the | 15:46:59 |
| 21 | MAVS code. Do you represent those people? | 15:47:07 |
| 22 | A. If they were still in place, | 15:47:12 |
| 23 | they're invested in the Voyager token, and they | 15:47:15 |
| 24 | lost their investment when Voyager collapsed, | 15:47:18 |
| 25 | then I would say yes. | 15:47:21 |

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| | | | |
|----|----|--|----------|
| 1 | Q. | In that answer you didn't have any | 15:47:24 |
| 2 | | touchpoints to Mr. Cuban or the Mavs. | 15:47:28 |
| 3 | | MR. BUSHMAN: Object to the form. | 15:47:33 |
| 4 | Q. | Do you say that it's not required | 15:47:35 |
| 5 | | under that class of people, to have a touchpoint | 15:47:37 |
| 6 | | to Mr. Cuban and the Mavs? | 15:47:40 |
| 7 | | MR. BUSHMAN: Object to the form. | 15:47:43 |
| 8 | A. | I'm not saying that. | 15:47:45 |
| 9 | Q. | Okay. So, do they have to have -- | 15:47:50 |
| 10 | | do the investors who opened their account after | 15:47:55 |
| 11 | | October 27th, 2021, but did not use the MAVS | 15:47:58 |
| 12 | | code, still have to have a touchpoint to | 15:48:05 |
| 13 | | Mr. Cuban and the Mavs to be part of the class | 15:48:07 |
| 14 | | you represent? | 15:48:11 |
| 15 | | MR. BUSHMAN: Object to the form. | 15:48:13 |
| 16 | A. | Am I really expected to know in | 15:48:20 |
| 17 | | such painstaking detail? Isn't that a question | 15:48:23 |
| 18 | | for the legal team? | 15:48:28 |
| 19 | Q. | You're the lead plaintiff in the | 15:48:31 |
| 20 | | class. I'm just asking -- | 15:48:35 |
| 21 | | MR. BUSHMAN: Steve, allow him to | 15:48:35 |
| 22 | | finish his answer and then you can ask him the | 15:48:37 |
| 23 | | next question. | 15:48:39 |
| 24 | | Todd, were you finished with your | 15:48:41 |
| 25 | | answer? | 15:48:44 |

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| | | |
|----|--|----------|
| 1 | THE WITNESS: Yeah. | 15:48:46 |
| 2 | Q. Do you understand that there may | 15:48:48 |
| 3 | be a group of people who opened their account at | 15:48:50 |
| 4 | Voyager after October 27th, but before the | 15:48:53 |
| 5 | bankruptcy in June or July of 2022, that didn't | 15:48:59 |
| 6 | use the MAVS100 code, correct? | 15:49:06 |
| 7 | A. Yes. | 15:49:12 |
| 8 | Q. And those people, if they didn't | 15:49:12 |
| 9 | redeem, lost money as well, correct? | 15:49:14 |
| 10 | A. Correct. | 15:49:17 |
| 11 | Q. And I'm just trying to determine, | 15:49:17 |
| 12 | that class of people, do you believe there has | 15:49:25 |
| 13 | to be any -- the claim is, you're bringing a | 15:49:28 |
| 14 | claim against the Mavericks and Mark Cuban, | 15:49:33 |
| 15 | right? | 15:49:38 |
| 16 | MR. BUSHMAN: Object to the form. | 15:49:39 |
| 17 | A. Yes. | 15:49:40 |
| 18 | Q. And so necessary to the claim | 15:49:40 |
| 19 | against Mark Cuban and the Dallas Mavericks is | 15:49:42 |
| 20 | that they did something wrong, correct? | 15:49:47 |
| 21 | MR. BUSHMAN: Object to the form. | 15:49:52 |
| 22 | A. Yes. | 15:49:58 |
| 23 | Q. You're lead plaintiff in a case | 15:50:00 |
| 24 | where there have been allegations of conduct by | 15:50:02 |
| 25 | the Dallas Mavericks and Mark Cuban, right? | 15:50:08 |

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| 1 | A. | Yes. | 15:50:12 |
| 2 | Q. | And so, now going back to this | 15:50:15 |
| 3 | | class of people that opened their account after | 15:50:18 |
| 4 | | October 27th but didn't use the MAVS code, the | 15:50:21 |
| 5 | | question is do you represent, as the lead | 15:50:27 |
| 6 | | plaintiff in this case, those investors who | 15:50:30 |
| 7 | | opened their account after October 27th but | 15:50:32 |
| 8 | | didn't use the MAVS code, and have no way of | 15:50:39 |
| 9 | | showing on its face that they relied in any way, | 15:50:44 |
| 10 | | shape or form on Mark Cuban or the Mavs? | 15:50:48 |
| 11 | | MR. BUSHMAN: Object to the form. | 15:50:54 |
| 12 | A. | All I can say is anybody that | 15:51:00 |
| 13 | | invested in the platform where Mark Cuban was a | 15:51:02 |
| 14 | | partner and the Mavs were promoting, and that | 15:51:10 |
| 15 | | was such a huge deal. I mean, this guy is a | 15:51:15 |
| 16 | | billionaire, he's followed by so many people. | 15:51:18 |
| 17 | | It's hard for me to believe that somebody could | 15:51:21 |
| 18 | | be invested in Voyager and not the right time | 15:51:26 |
| 19 | | and not use the code and not be involved in earn | 15:51:28 |
| 20 | | and not buy VGX and not have anything to do with | 15:51:31 |
| 21 | | the Mavs or Mark Cuban. | 15:51:35 |
| 22 | Q. | Well, Mr. Webb, you're a pretty | 15:51:40 |
| 23 | | knowledgeable guy in crypto. You know that | 15:51:43 |
| 24 | | there are other sponsors and celebrity endorsers | 15:51:46 |
| 25 | | of Voyager, correct? | 15:51:52 |

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| 1 | MR. BUSHMAN: Object to the form. | 15:51:53 |
| 2 | A. I'm not aware of who those are, | 15:51:55 |
| 3 | no. | 15:51:58 |
| 4 | Q. All right. Look, are you aware | 15:51:58 |
| 5 | that there's something called referral codes? | 15:52:00 |
| 6 | Do you know what a referral code is? | 15:52:06 |
| 7 | A. A referral code, yes. | 15:52:09 |
| 8 | Q. What is a referral code, as you | 15:52:10 |
| 9 | understand it in the crypto world? | 15:52:13 |
| 10 | A. That might be something that the | 15:52:16 |
| 11 | platform will reward their existing platform | 15:52:23 |
| 12 | customers by recruiting other people to the | 15:52:25 |
| 13 | platform by using a code, or may be even people | 15:52:28 |
| 14 | that aren't on the platform, they could have an | 15:52:37 |
| 15 | agreement to give them some incentives. Or -- | 15:52:41 |
| 16 | Q. Would it surprise you that -- I'm | 15:52:46 |
| 17 | sorry. Were you finished? | 15:52:49 |
| 18 | A. Not exactly, but... | 15:52:52 |
| 19 | Q. No, please, finish the thought. | 15:52:54 |
| 20 | A. It's more of a way to track where | 15:53:00 |
| 21 | their new customers are coming from, what | 15:53:05 |
| 22 | promotions they're putting out there, which ones | 15:53:08 |
| 23 | are working and which ones aren't, right? Am I | 15:53:10 |
| 24 | understanding? | 15:53:15 |
| 25 | Q. 100 percent agree. And in doing | 15:53:17 |

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| 1 | that, it's evidence that they were not | 15:53:19 |
| 2 | influenced by Mr. Cuban or the Mavs for signing | 15:53:24 |
| 3 | up; they were influenced by something else. | 15:53:29 |
| 4 | Would you agree with that? | 15:53:32 |
| 5 | MR. BUSHMAN: Object to the form. | 15:53:33 |
| 6 | A. Not entirely. Because if somebody | 15:53:34 |
| 7 | followed Mark Cuban and wanted to be on the | 15:53:37 |
| 8 | platform, they missed the MAVS100 code, they may | 15:53:40 |
| 9 | have been searching for other codes. | 15:53:45 |
| 10 | Q. But you can't determine that, as | 15:53:46 |
| 11 | we've discussed, on the face of the documents. | 15:53:48 |
| 12 | You would have to speak to that investor or | 15:53:51 |
| 13 | accountholder individually, correct? | 15:53:56 |
| 14 | MR. BUSHMAN: Object to the form. | 15:53:58 |
| 15 | A. Yes. | 15:54:04 |
| 16 | Q. Would it surprise you -- you know | 15:54:05 |
| 17 | what, let's get into it right now. | 15:54:09 |
| 18 | MR. BEST: Can I have, go to tab | 15:54:20 |
| 19 | 32, please. | 15:54:25 |
| 20 | THE TECHNICIAN: Just to confirm, | 15:54:43 |
| 21 | counsel, this is the technician, was that -- | 15:54:44 |
| 22 | MR. BEST: That's the new binder, | 15:54:47 |
| 23 | that's the Twitter feed starting with Rob | 15:54:52 |
| 24 | Gronkowski's Twitter feed on October 15, 2021. | 15:54:57 |
| 25 | THE TECHNICIAN: And what was the | 15:55:02 |

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| 1 | tab number? | 15:55:02 |
| 2 | MR. BEST: I have 32. I'm sorry. | 15:55:03 |
| 3 | Garrison 32. | 15:55:11 |
| 4 | THE TECHNICIAN: Sorry about that. | 15:55:12 |
| 5 | That's what I was -- | 15:55:14 |
| 6 | MR. BEST: I apologize. I'm the | 15:55:14 |
| 7 | slow guy in the room. Everybody else is having | 15:55:22 |
| 8 | to keep me going here. | 15:55:25 |
| 9 | (Exhibit Webb 3 was marked and | 15:55:25 |
| 10 | introduced at this time.) | 15:55:25 |
| 11 | Okay, if you can enlarge that. | 15:55:40 |
| 12 | Q. I'm showing you what's marked as | 15:55:42 |
| 13 | Defendant's, and I apologize, is it 3 or 2? | 15:55:44 |
| 14 | MR. BUSHMAN: 3. | 15:55:53 |
| 15 | Q. Which is, I represent, a fair and | 15:55:53 |
| 16 | accurate screenshot of a Twitter feed from | 15:55:56 |
| 17 | October 15th, 2021. And at the top do you see | 15:56:02 |
| 18 | "Rob Gronkowski reposted"? Do you see that? | 15:56:08 |
| 19 | A. Yes. | 15:56:12 |
| 20 | Q. Do you know who Rob Gronkowski is? | 15:56:12 |
| 21 | A. I believe he's an ex-football | 15:56:16 |
| 22 | player. | 15:56:20 |
| 23 | Q. And do you know that he was a | 15:56:20 |
| 24 | Voyager -- he had a sponsorship agreement with | 15:56:27 |
| 25 | Voyager and promoted Voyager on a routine basis? | 15:56:32 |

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| 1 | Did you know that? | 15:56:39 |
| 2 | A. I became aware of that later, but | 15:56:41 |
| 3 | not... | 15:56:44 |
| 4 | Q. Okay. So -- | 15:56:48 |
| 5 | MR. BUSHMAN: I'm sorry, were you | 15:56:49 |
| 6 | finished? You said "but not"? | 15:56:50 |
| 7 | A. But not that he was repeatedly. I | 15:56:58 |
| 8 | forgot what you said in the end there. | 15:57:02 |
| 9 | Q. And do you see him reposting a | 15:57:06 |
| 10 | Voyager tweet saying that Bitcoin's at an | 15:57:11 |
| 11 | all-time high? | 15:57:16 |
| 12 | A. Okay. | 15:57:17 |
| 13 | Q. And do you see underneath it it | 15:57:19 |
| 14 | says loading and at 99 percent? What do you | 15:57:25 |
| 15 | understand a reposting to do? | 15:57:28 |
| 16 | MR. BUSHMAN: Object to the form. | 15:57:33 |
| 17 | A. I'm a little confused again at | 15:57:35 |
| 18 | what I'm looking at. So this is a -- | 15:57:37 |
| 19 | Q. It's a Twitter feed from Voyager | 15:57:40 |
| 20 | about -- as of October 15, 2021, stating that | 15:57:43 |
| 21 | Bitcoin's at an all-time high and it's loading. | 15:57:49 |
| 22 | A. So this is Rob -- | 15:57:54 |
| 23 | Q. Rob -- | 15:57:56 |
| 24 | A. -- Rob Gronkowski's account and | 15:57:59 |
| 25 | he's reposting something that Voyager posted on | 15:58:01 |